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November 11, 1998

Andrew Turley, Supervisory Attorney  
Federal Election Commission  
999 East Street, NW  
Washington, DC 20463

RE: MUR 4816 - Ken Calvert for Congress Committee

Dear Mr. Turley:

This letter responds to your letter of October 5, 1998 concerning the above-referenced MUR. We are representing the Ken Calvert for Congress Committee with respect to this MUR.

Let me first say that we find the information in Mr. Khoury's letter of August 11, 1998, and the many exhibits attached thereto very confusing, and therefore difficult to rebut. Mr. Khoury's allegations relate almost entirely to his unhappiness with aspects of the primary campaign in the spring of this year and have nothing to do with the Federal Election Campaign Act ("FECA"). More importantly, Mr. Khoury's allegations do not raise any substantiated or verified evidence of a possible violation of the FECA by the Calvert for Congress Committee.

Leaving all of his apparent anger and political conjecture aside, it appears that Mr. Khoury's allegation is that the Cook Barela campaign was in fact an adjunct of the Calvert for Congress campaign, and should have been reported as such.

We categorically deny these allegations. The Ken Calvert for Congress Committee did not recruit, fund, direct, or puppeteer Cook Barela for his congressional campaign. These allegations are false.

To the contrary, we respectfully suggest that the complaint filed by Mr. Khoury is a result of his frustration and disappointment at losing the primary election, and we think he is more interested in being able to publicly claim that the "Ken Calvert for Congress Committee is under investigation" -- possibly as a vehicle by which to run for this congressional seat in the future. Consequently, we want to cooperate fully with your investigation so it can be completed as expeditiously as possible.

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To this end, we have discussed the issue at length with Mr. Ed Slevin, the Ken Calvert for Congress campaign manager. Both he and the Congressman have no political relationship with Mr. Barela. In fact, according to their recollection, they have only been in the same room or spoken with Mr. Barela on two occasions in the past several years and on neither occasion was the subject of Mr. Barela's political plans or desire to run for Congress discussed.

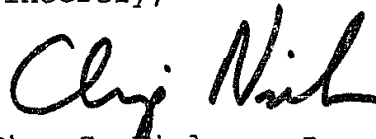
Additionally, Mr. Khoury appears to take issue with the fact that the Calvert campaign chose to focus on running primarily against him as opposed to focusing the campaign's attention on both him and Mr. Barela. The simple reason for this tactical decision on the Calvert campaign's behalf was the fact that Mr. Khoury had run against Congressman Calvert on three prior occasions. In the view of the Calvert campaign manager, it simply made no sense to focus on Mr. Barela's candidacy as he was a virtual unknown in the race.

In closing, we want to reiterate that Mr. Khoury's allegations do not raise any substantiated or credible evidence that the Ken Calvert for Congress Committee acted in collusion with Cook Barela with respect to his congressional campaign. We therefore request that you dismiss this matter in its entirety.

We further request that because of what we believe to be the political motives underlying this complaint, we request that this matter remain confidential pursuant to 2 USC 437g(a)(12)(A).

Please feel free to contact me directly should you have any further questions.

Sincerely,



Vigo G. Nielsen, Jr.

VGN/djf  
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